



**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel for Enforcement

Stephen Gura  
Deputy Associate General Counsel for Enforcement

**BY:** Mark Allen *MA*  
Assistant General Counsel

Roy Q. Lockett *RQL*  
Attorney

**SUBJECT:** MUR 7586 (International Council of Shopping Centers, Inc., *et al.*)  
Recommendation to Accept Signed Conciliation Agreement

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On March 20, 2019, the Commission found reason to believe that International Council of Shopping Centers, Inc. ("ICSC") violated 52 U.S.C. §§ 30118(a) and 30102(b)(2) and 11 C.F.R. §§ 102.6(c)(4) and 102.8(b) and found reason to believe that the International Council of Shopping Centers, Inc. Political Action Committee ("ICSC PAC") violated 52 U.S.C. §§ 30118(a), 30102(b)(2) and 30104(b) and 11 C.F.R. § 102.6(c)(1). The Commission found that ICSC improperly deposited corporate funds into ICSC PAC's federal account, ICSC did not timely transfer PAC contributions, and ICSC PAC inaccurately reported its cash-on-hand. The Commission authorized the Office of the General Counsel to engage in pre-probable cause conciliation with Respondents.

We recommend that the Commission accept this agreement and close the file in this matter.

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We believe this negotiated settlement represents a reasonable resolution of the matter. We therefore recommend that the Commission accept the signed conciliation agreement with Respondents and close the file.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement.
2. Approve the appropriate letter.
3. Close the file.

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<sup>1</sup> Laird remains identified as the ICSC PAC treasurer in the caption and the preamble statement of the Commission's reason-to-believe findings.